

Annual 47 CFR § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2018 covering the prior calendar year 2017.

1. Date filed: March 16, 2018
2. Name of company(s) covered by this certification: Ooma, Inc.
3. Form 499 Filer ID: 826871
4. Name of signatory: Spencer Jackson
5. Title of signatory: VP & General Counsel
6. Certification:

I, Spencer Jackson, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 CFR § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, safeguards, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 CFR § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed



Attachments: Accompanying Statement explaining CPNI procedures

CPNI COMPLIANCE STATEMENT AND OPERATING PROCEDURES OF OOMA, INC.

(Calendar Year 2017)

Ooma, Inc. ("Ooma" or "Company") provides local exchange and long-distance services via Voice over Internet Protocol (VoIP) on a prepaid basis to residential and small business customers. The Company does not use or permit access to CPNI to market any services outside of the total service approach as specified in 47 CFR §64.2005. If Ooma elects to use CPNI in a manner that does require customer approval, it will follow the applicable rules set forth in 47 CFR Subpart U, including the institution of operational procedures to ensure that notification is provided, and customer approval is obtained before CPNI is used or disclosed.

Ooma has taken steps to secure CPNI and call detail records, and to manage the release of such information in accordance with FCC rules. The Company has put into place processes to safeguard customer CPNI and call detail information from improper use or disclosure by employees, and to discover and protect against attempts by third parties to gain unauthorized access to CPNI.

The Company requires customers to create their own password at the initiation of service. The Company does not issue passwords, other than temporary passwords that are sent only to a customer's email address on record, when the Company has authenticated the customer's identity and the customer has requested that their password be reset.

The Company provides call detail information over the telephone only once the ANI number the customer is calling from matches one of the telephone numbers on the account. If there is not an ANI match, (a) only general account information will be given upon successful verification of the email address, and (b) disclosure of additional account information or the acceptance of account changes requires successful verification of the last 4 digits of the customer's credit card on file. Access to call detail information is also available online with a password. In the event of a partner relationship where Ooma, Inc. is providing telephone support to the partner's customer, the partner is accountable for account verification and bears the liability to protect customer sensitive information. When a partner company transfers a customer call to Ooma for support, the receiving party at Ooma will confirm that the customer's account information has been previously verified prior to transfer.

The Company provides written notification to its customers, via a previously established email address or by mail to the customer address of record, of all account changes (without revealing the changed information or sending the notification to any changed or new account address), password changes, changes to an online account, and any changes to, or the creation of, an address of record other than at service initiation.

The Company maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI.

The Company does not have retail locations and, therefore, does not disclose CPNI in-store. Retail sales of Ooma product(s) are available through "brick and mortar" retail establishments as well as on-line shopping websites. Ooma does not own or control any of the retail establishments or websites (other than its own). No employee of such retail locations has access to any customer account information. Customers are required to connect to Ooma service through the Company's website or via telephone. This allows the Company to establish the safeguards needed to protect CPNI and call detail records for service initiation.

The Company has procedures in place to notify law enforcement (United States Secret Service and FBI) of a breach of a customer's CPNI within seven (7) business days, and to notify customers of the breach. The Company will maintain a record of any breaches discovered and notifications made to the United States Secret Service and FBI. The customer's electronic record will be updated with information regarding notifications on CPNI breaches.